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August 6, 2008

**By electronic filing**

The Honorable Elizabeth D. Laporte  
Northern District of California  
450 Golden Gate Ave., 15th Floor  
San Francisco, CA 94102

**Re: *Bhatnagar v. Ingrassia et al.*, Case No. 3:07-cv-02669 (CEB)(EDL)**

Dear Magistrate Judge Laporte:

Pursuant to the court's order dated August 4, 2008, Plaintiff submits this letter to inform the court of any discovery requests that are no longer at issue in Plaintiff's Motion to Compel Responses to the 1<sup>st</sup> Set of Discovery Requests on Defendant Ingrassia, filed on July 26, 2008. Starting on July 16, 2008, Defendant County of Contra Costa ("County") began producing documents in response to Plaintiff's 2<sup>nd</sup> Set of Document Requests on the County. Because some of the documents produced by the County overlap with discovery sought from Defendant Ingrassia, Plaintiff withdraws several of the discovery requests at issue in his motion to compel, as detailed below.

First, in light of the County's production of policies, procedures, and training records pertaining to Defendant Ingrassia, Plaintiff withdraws Interrogatory Request No. 9 and Document Request No. 7 in their entirety.

Second, the County produced information from which Plaintiff can determine the salary and benefits received by Defendant Ingrassia. For this reason, Plaintiff will withdraw information requested in Interrogatory Request No. 1(c). All other information requested by Interrogatory Request No. 1 remain at issue, including each employment position held by Defendant Ingrassia, the dates of employment, a description of his duties and responsibilities in each position, identification of his director supervisor in each position, and the reason why he left the position.

Finally, the County produced portions of Defendant Ingrassia's personnel file with redactions of significant and relevant information. Among other documents, the County has

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agreed to produce unredacted copies of Defendant Ingrassia's personnel file, upon the issuance of a court order. The County stated that it would not oppose any request by Plaintiff for such an order, but anticipates objections from Defendant Ingrassia. Therefore, Plaintiff requests that the court consider the parties' arguments relating to Document Request No. 1 and if appropriate, order the County to produce an unredacted copy of Defendant Ingrassia's personnel file.

In all other respects, the discovery sought in Plaintiff's motion to compel remain at issue. The court's time and consideration of this matter is sincerely appreciated.

Yours truly,

/s/ Jenny Huang

Jenny Huang

cc: James Fitzgerald, Esq.  
Gregory Harvey, Esq.